

CARY KANE

A LIMITED LIABILITY PARTNERSHIP FOR THE PRACTICE OF LAW

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March 8, 2018

VIA ECF

Hon. Lois Bloom
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11210

Re: Angella Thigpen v. Carol Westfall, Board of Trustees of the Local 807 Labor-
Management Pension Fund, 18-CV-162 (PKC)(LB)

Your Honor,

This firm represents the Board of Trustees of the Local 807 Labor-Management Pension Fund (the "Fund"), a defendant in the matter noted above. During a hearing before the Hon. Pamela K. Chen on March 6, 2018, we requested permission to amend a paragraph of the Fund's answer to correct a typographical error as to the year of death for Plaintiff's father. Judge Chen directed that we do so by letter addressed to you.

Accordingly, the Fund asks to amend paragraph 11 of its Fourth Affirmative Defense, at page 6 of the Fund's answer, as follows: "Thigpen died in May 2014, more than 60 months after he began receiving pension benefits and thus, no benefits were due under the 60 month guarantee."

A copy of this letter has been mailed to Plaintiff.

Respectfully submitted,

Cary Kane, LLP


By: Susan Bruno

Cc: Ms. Angella Thigpen

